



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hillon • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

December 11, 2002

Certified Mail No. 7000 1670 0013 9129 3728

Chad Eberhard
Plant Manager
Basic American Foods
434 S. Emerson Ave.
Shelley, ID 83274

RE: AIRS Facility No. 011-00020, Basic American Foods, Shelley
Final Tier I Operating Permit

Dear Mr. Eberhard:

The Department of Environmental Quality (Department) is issuing Tier I Operating Permit No. 011-00020 to Basic American Foods' facility in Shelley, in accordance with IDAPA 58.01.01.300 - 386. The enclosed permit is effective immediately and is based on the information contained in your permit application, received June 16, 1995.

Rick Elkins of the Pocatello Regional Office will contact you regarding a meeting to discuss the permit terms and requirements. The Department recommends the following representatives attend this meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of the decision. However, prior to filing a petition for a contested case, the Department encourages you to contact Bill Rogers at (208) 373-0502 or wrogers@deq.state.id.us to discuss any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Kelly", is written over the word "Sincerely," and the typed name "Katherine B. Kelly".

Katherine B. Kelly
Administrator
Air Quality Division

KK/cpr Project No. T1-9506-076 G:\Air Quality\Stationary Source\SS Ltd\T1\BAF Shelley\Final Permit\T1-9506-076 Final PL.doc

Enclosures

cc: Sherry Davis, Air Quality Division
Rick Elkins, Pocatello Regional Office
Laurie Kral, EPA Region 10



Air Quality
TIER I OPERATING PERMIT
State of Idaho
Department of Environmental Quality

PERMIT No.: 011-00020

AQCR: 061

CLASS: A

SIC: 2034

ZONE: 12

UTM COORDINATE (km): 409.0, 4803.5

1. PERMITTEE

Basic American Foods

2. PROJECT

Tier I operating permit

3. MAILING ADDRESS

434 S. Emerson Ave.

CITY

Shelley

STATE

ID

ZIP

83274

4. FACILITY CONTACT

Chad Eberhard

TITLE

Plant Manager

TELEPHONE

(208) 357-3402

5. RESPONSIBLE OFFICIAL

Larry Sautter

TITLE

Environmental Manager

TELEPHONE

(208) 357-3402

6. EXACT PLANT LOCATION

434 S. Emerson Ave., Shelley, Idaho

COUNTY

Bingham

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Potato processing and packaging

8. PERMIT AUTHORITY

This Tier I operating permit is issued pursuant to Idaho Code §39-115 and the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.300 - 386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Department for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210 and the permittee elects not to incorporate those terms and conditions into this operating permit.

The effective date of this permit is the date of signature by the Department on the cover page.

KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: December 11, 2002

DATE EXPIRES: December 11, 2007

TABLE OF CONTENTS

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE	3
1. TIER I OPERATING PERMIT SCOPE	4
2. FACILITY-WIDE CONDITIONS.....	9
3. BOILERS.....	17
4. PROCESS A	20
5. DRIED POTATO PRODUCTS (B).....	22
6. COMPLIANCE SCHEDULE	24
7. INSIGNIFICANT ACTIVITIES.....	26
8. NONAPPLICABLE REQUIREMENTS.....	28
TIER I OPERATING PERMIT GENERAL PROVISIONS	30

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
Btu/hr	British thermal units per hour
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
Department	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
gr/dscf	grains per dry standard cubic foot
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MMBtu/hr	million British thermal units per hour
mmHg	millimeters of mercury
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operations and maintenance
O ₂	oxygen
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter of 10 micrometers or less
PW	process weight
PTC	permit to construct
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO _x	oxides of sulfur
T/yr	tons per year
U.S.C.	United States Codes
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020**Permittee:** Basic American Foods**Date Issued:** December 11, 2002**Location:** Shelley, Idaho**Date Expires:** December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

1. TIER I OPERATING PERMIT SCOPE***Purpose***

- 1.1 This Tier I operating permit establishes facility-wide requirements in accordance with the Idaho State Implementation Plan and the *Rules for the Control of Air Pollution in Idaho*.
- 1.2 This Tier I permit incorporates the following permits:
- PTC No. 0140-0020, issued March 20 1990
 - PTC No. 011-00020, issued September 10, 2001

Regulated Sources

- 1.3 Table 1.1 lists all sources of regulated emissions in this Tier I operating permit.

Table 1.1 Regulated Sources in this Tier I Operating Permit

Permit Sections	Source Description	Emissions Control(s)
3	Boiler 1 - Cleaver Brooks Model D-52, 42.9 MMBtu/hr	None
3	Boiler 3 - Keeler Model D-52, 28.6 MMBtu/hr	None
3	Boiler 4 - Cleaver Brooks Model DI-76-RH, 72.1 MMBtu/hr	None
3	Boiler 5 - 24.5 MMBtu/hr	None
4	Process A - Dried potato products	None
5	Process B - Dried potato products	None

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Table 1.2 Monitoring and Reporting Summary

Requirement	Category	Description	Frequency	Record Retention	Report Required	When
Boilers	Monitoring	<p>The following shall be monitored and recorded for each boiler on a daily basis:</p> <ol style="list-style-type: none"> 1) Date 2) Amount of steam generated per boiler 3) Type of fuel and fuel consumption per boiler 4) The cumulative fuel consumption and cumulative number of hours of operation per boiler on natural gas fuel and on No. 2 diesel fuel. <p>Must maintain copies of fuel supplier certificates showing that the No.2 diesel fuel complies with the definition of distillate oil in 40 CFR 60.41c and that it contains a maximum sulfur content of 0.05% by weight.</p>	Daily	5 years	Every 6 months from the effective date of the permit	Within 30 days after the reporting period (twice yearly)
Boilers	Fuel Certification	<p>Keep records and submit reports to the Department containing the following:</p> <ol style="list-style-type: none"> 1) Fuel supplier certifications which include on an as-received basis, the name of the fuel supplier, a statement that the fuel complies with 40 CFR 60.41c, and that the sulfur content does not exceed 0.05% by weight. 2) Certification by the plant manager that the above certifications represent all of the fuel oil combusted during that quarter. 	Upon receipt of fuel oil deliveries.	5 years	Quarterly from the effective date of the permit	Within 30 days after the reporting period (4 times yearly)
Fugitive Emissions	General/ Construction	Monitor and maintain records of the frequency and methods used to reasonably control fugitive emissions.	As Applicable	5 years	Every 6 months from the effective date of the permit	Within 30 days after the reporting period (First period ends 12 months after the effective date of the permit)
Fugitive Emissions	Complaints	Maintain records of all fugitive dust complaints. Records shall include at least the date complaint is received, a description of the complaint, BAF's assessment of its validity, the corrective action taken, and the date the corrective action was taken.	Per occurrence	5 years	Every 6 months from the effective date of the permit	Within 30 days after the reporting period (First period ends 12 months after the effective date of the permit)

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Requirement	Category	Description	Frequency	Record Retention	Report Required	When
Fugitive Emissions	Inspection	Conduct a facility-wide inspection of potential sources of fugitive emissions. Records shall include, at a minimum, the date of each inspection, a description of conditions for any observed fugitive emission (i.e., location, source, weather, and activity), the corrective action taken, and the date the corrective action was taken.	Quarterly	5 years	Every 6 months from the effective date of the permit	Within 30 days after the reporting period (First period ends 12 months after the effective date of the permit)
Odors	Complaints	Maintain records of all odor complaints. Records shall include at least the date complaint is received, a description of the complaint, BAF's assessment of its validity, the corrective action taken, and the date the corrective action was taken.	Per occurrence	5 years	Every 6 months from the effective date of the permit	Within 30 days after the reporting period (First period ends 12 months after the effective date of the permit)
Visible Emissions	Inspection	Conduct monthly one-minute observations of each of the following stacks, using EPA Method 22: P1-1, P2-1, P3-1, P4-1, P6-1, P8-1N, P8-1S, P8-2N, P8-2S P9-1, P10-1, P11-1 If visible emissions above 10% opacity are observed from any stack, conduct a six-minute observation using EPA Method 9. Record and maintain in accordance with Permit Condition 2.11.	Monthly	5 Years	Summarize Every 6 months from the effective date of the permit	Within 30 days after the reporting period (First period ends 12 months after the effective date of the permit)
Excess Emissions	Inspection	Notify the Department (by phone, fax, or e-mail) of any upset, breakdown, or safety event that results in excessive emissions. Notification shall identify the time, specific location (triple alpha of stack), the equipment involved, and the cause (to the extent known).	Per occurrence	5 years	Per occurrence and summarize Every 6 months from the effective date of the permit	Within 24 hours of occurrence
Excess Emissions	Inspection	Submit a written report of each excessive emissions event to the Department. The report shall include at least the following: 1) the time period for which the event occurred 2) the cause(s) and whether due to startup, shutdown, scheduled maintenance, upset, breakdown or a safety measure 3) an estimate of the quantity of each regulated air pollutant emitted 4) a description of the corrective actions taken	Per occurrence	5 years	Per occurrence & summarize Every 6 months from the effective date of the permit	Within 15 days of occurrence

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Requirement	Category	Description	Frequency	Record Retention	Report Required	When
		5) Certification of compliance with IDAP 58.01.01.131-136				
Compliance Certification	All	<p>Submit a Compliance Certification addressing all the conditions contained in the Tier I operating permit that are applicable to emissions unit. Include all emissions limitations, standards, and work practices. The compliance certification shall be itemized, providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):</p> <p>i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;</p> <p>ii. The identification of the method(s), or other means, used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA which prohibits knowingly making a false certification or omitting material information;</p> <p>iii. The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in paragraph 21.d.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify, as possible exceptions to compliance, any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;</p>	Annually, beginning 12 months from the permit issuance date	5 years	Every 6 months from the effective date of the permit	Within 30 days after the reporting period (First period ends 12 months after the effective date of the permit)

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Requirement	Category	Description	Frequency	Record Retention	Report Required	When
		iv. Such other facts as the Department may require to determine the compliance status of the source.				
Inspections are to be made during daylight hours under normal operating conditions.						
Condition 2.11.1: The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Monitoring information records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to Department representatives upon request.						
Condition 2.11.2: During periods when a process or activity is shut down or not operating, monitoring requirements for that process are suspended. In these circumstances, monitoring reports submitted shall note that the process was shut down or not operating, and shall provide, as applicable, the dates of shut down and start-up.						

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020**Permittee:** Basic American Foods**Date Issued:** December 11, 2002**Location:** Shelley, Idaho**Date Expires:** December 11, 2007*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***2. FACILITY-WIDE CONDITIONS**

The following table contains a summary of requirements that apply generally to emissions units at the facility.

Table 2.1 Facility-wide Applicable Requirements Summary

Permit Condition	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
2.1	Fugitive emissions	Reasonable precautions	IDAPA 58.01.01.650-651	2.2, 2.3, 2.4, 2.11.1, 2.11.2
2.5	Odorous gas, liquids, or solids	No emissions that cause air pollution	IDAPA 58.01.01.775-776	2.6, 2.11.1, 2.11.2
2.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.8, 2.11.1, 2.11.2
2.9	Excess emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130	2.9-2.9.5, 2.11.1, 2.11.2
2.12	Open burning	Compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600-616	2.11.1, 2.11.2
2.13	Asbestos	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	2.11.1, 2.11.2
2.14	Chemical accident prevention	Compliance with 40 CFR 68.215(a)(2)	40 CFR 68.215(a)(2); IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 70.6(c)(5)	2.11.1, 2.11.2
2.15	Air quality standards	EPA reference test methods	40 CFR 60; IDAPA 58.01.01.157	2.11.1, 2.11.2, 2.18
2.16	Fuel-burning equipment PM standard	Grain-loading	IDAPA 58.01.01.676-677	2.11.1, 2.11.2
2.17	Fuel oil sulfur content limit	ASTM Grade 1 fuel oil – 0.3% by weight; ASTM Grade 2 fuel oil – 0.5% by weight	IDAPA 58.01.01.728	2.11.1, 2.11.2
2.18	Criteria air pollutants, opacity	Compliance testing	IDAPA 58.01.01.157	2.11.1, 2.11.2, 2.15
2.19	Recycling and emissions reduction	Reduce emission of Class I and Class II refrigerants in accordance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	2.11.1, 2.11.2
2.20	Incinerators	Compliance with IDAPA 58.01.01.785-788	IDAPA 58.01.01.785-788	2.11.1, 2.11.2

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.
[IDAPA 58.01.01.650-651, 5/1/94]
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
[IDAPA 58.01.01.322.06, 07, 5/1/94]
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
[IDAPA 58.01.01.322.06, 07, 5/1/94]
- 2.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to insure that all reasonable precautions are being taken to prevent fugitive emissions. If fugitive emissions are observed, the permittee shall review operations to insure that all reasonable precautions are being taken to prevent fugitive emissions. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each quarterly fugitive emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.
[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Odors

- 2.5 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
[IDAPA 58.01.01.775-776, 5/1/94]
- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Visible Emissions

- 2.7 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
[IDAPA 58.01.01.625, 4/5/00]
- 2.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each quarterly visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.
[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Excess Emissions

- 2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130 -136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 2.9 and the regulations of IDAPA 58.01.01.130-136.
- 2.9.1 The person responsible for or in charge of a facility during an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing such excess emissions event, to reduce the frequency of occurrence of such events, to minimize the amount by which the emission standard is exceeded, and shall, as provided below or upon request of the Department, submit a full report of such occurrence including a statement of all known causes and of the scheduling and nature of the actions to be taken.
[IDAPA 58.01.01.132, 4/5/00]
- 2.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emissions unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:
[IDAPA 58.01.01.133, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- A prohibition of any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory and/or a Wood Stove Curtailment Advisory have/has been declared by the Department.

[IDAPA 58.01.01.133.01.a, 3/20/97]

- Notifying the Department of the excess emissions event as soon as reasonably possible, but no later than two hours prior to the start of the excess emission event, unless the owner or operator demonstrates to the Department's satisfaction that a shorter advanced notice was necessary.

[IDAPA 58.01.01.133.01.b, 4/5/00]

- The owner or operator of a source of excess emissions shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133.01.c, 3/20/97]

2.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

[IDAPA 58.01.01.134, 4/5/00]

2.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

- The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.

[IDAPA 58.01.01.134.02.a, 4/5/00]

- The owner or operator shall notify the Department by phone, fax, or e-mail of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to the Department's satisfaction that the longer reporting period was necessary.

[IDAPA 58.01.01.134.02.b, 4/5/00]

- The owner or operator shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

[IDAPA 58.01.01.134.02.c, 3/20/97]

2.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, the Department may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the excess emissions until such time as the condition causing the excess emissions has been corrected or brought under control. Such action by the Department shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the facility owner or operator.

[IDAPA 58.01.01.134.03 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 2.9.4 A written report for each excess emissions event shall be submitted to the Department by the owner or operator no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135.01, 3/20/97; IDAPA 58.01.01.135.02, 4/5/00]

- 2.9.5 The owner or operator shall maintain excess emissions records for the most recent five-calendar-year period and shall maintain them at the facility for the most recent two-calendar-year period. The excess emissions records shall be made available to Department representatives upon request. The excess emissions records shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

[IDAPA 58.01.01.136.01, 02, 3/20/97; IDAPA 58.01.01.136.03, 4/5/00]

- An excess emissions record book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to the Department pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment.

[IDAPA 58.01.01.136.03.a, 4/5/00]

- Copies of all startup, shutdown, and scheduled maintenance procedures and upset/breakdown/safety preventative maintenance plans which have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136.03.b, 3/20/97; IDAPA 58.01.01.130-136, 4/5/00]

(state-only; federally enforceable upon approval into the SIP); IDAPA 58.01.01.322.08.b, 3/23/98]

Reports and Certifications

- 2.10 All periodic reports and certifications required by this permit shall be submitted to the Department within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Pocatello Regional Office
444 Hospital Way, Suite 300
Pocatello, ID 83201
Phone: (208) 236-6160 Fax: (208) 236-6168

The periodic compliance certification required by General Provision 21 shall also be submitted within 30 days of the end of the specified reporting period to the following address:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Ave.
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Monitoring and Recordkeeping

2.11.1 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Monitoring information records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to Department representatives upon request.

[IDAPA 58.01.01.322.07, 5/1/94]

2.11.2 During periods when a process or activity is shut down or not operating, monitoring requirements for that process are suspended. In these circumstances, monitoring reports submitted shall note that the process was shut down or not operating, and shall provide, as applicable, the dates of shutdown and start-up.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Open Burning

2.12 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

[IDAPA 58.01.01.600-616, 5/1/94]

Renovation/Demolition

2.13 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

Regulated Substances for Accidental Release Prevention

2.14 An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10(a)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Test Methods

- 2.15 If testing is required, the permittee shall use the test methods listed in Table 2.2 to measure the pollutant emissions.

Table 2.2 EPA Reference Test Methods

Pollutant	Test Method*	Special Conditions
PM ₁₀	EPA Method 201.a. and EPA Method 202	
PM	EPA Method 5	
NO _x	EPA Method 7	
SO ₂	EPA Method 6	
CO	EPA Method 10	
VOC	EPA Method 25	
Visible Emissions	EPA Method 22	
Opacity	EPA Method 9	If an NSPS source, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only.

* Or Department-approved alternative in accordance with IDAPA 58.01.01.157

Fuel-burning Equipment

- 2.16 The following requirements shall apply to fuel-burning equipment at the facility:

- For fuel-burning equipment commencing operation on or after October 1, 1979, with a rated input of 10 MMBtu/hr or more, the permittee shall not discharge to the atmosphere PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% O₂ by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% O₂ by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% O₂ by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% O₂ by volume for wood products.
- For fuel-burning equipment in operation prior to October 1, 1979, or with a maximum rated input of 10 MMBtu/hr or less, the permittee shall not discharge to the atmosphere PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas; 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid 0.100 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.200 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[IDAPA 58.01.01.676, 5/1/94]

[IDAPA 58.01.01.677, 5/1/94]

Sulfur Content

- 2.17 No person shall sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 1 fuel oil - 0.3% by weight.
- ASTM Grade 2 fuel oil - 0.5% by weight.

[IDAPA 58.01.01.728, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Compliance Testing

- 2.18 If testing is required, the permittee shall provide notice of intent to test to the Department at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by Department approval.

The Department may, at its option, have an observer present at any emissions tests conducted on a source. The Department requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior Department approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by the Department for any testing deviations, the Department may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any compliance test, the permittee is encouraged to submit in writing to the Department, at least 30 days in advance, the following for approval:

- The type of test method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

Within 60 days following the date in which a compliance test required by this permit is concluded, the permittee shall submit to the Department a report for the respective test. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Pocatello Regional Office
444 Hospital Way, Ste. 300
Pocatello, ID 83201
(208) 236-6160 Fax: (208) 236-6168

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

Recycling and Emissions Reductions

- 2.19 The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, *Recycling and Emissions Reduction*.

[40 CFR 82, Subpart F]

Incinerators

- 2.20 The permittee shall comply with the requirements of IDAPA 58.01.01.785-788, *Rules for Control of Incinerators*.

[IDAPA 58.01.01.785-788, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

3. BOILERS

Summary Description

The following is a narrative description of the four natural gas-fired boilers regulated in this Tier I operating permit. This description is for informational purposes only.

The facility operates four natural gas-fired boilers that provide steam to the processes throughout the plant. A description of the boilers is listed in Table 3.1.

Table 3.1 Boilers

Boiler 1 - Cleaver Brooks Model D-52 with a rated heat input of 42.9 MMBtu/hr, installed in 1973.
Boiler 3 - Keeler Model D-52 with a rated heat input of 28.6 MMBtu/hr, installed in 1958.
Boiler 4 - Cleaver Brooks Model DI-76-RH with a rated heat input of 72.1 MMBtu/hr, installed in 1989.
Boiler 5- Cleaver Brooks rated heat input of 24.5 MMBtu/hr, installed in 2000.

Operational and emission limitations for Boilers 1, 3, and 4 are included in PTC No. 011-00020, issued September 10, 2001. Additional monitoring requirements for Boiler 4 are included in PTC No. 0140-0020, issued March 20, 1990.

Table 3.2 describes the control devices used to control emissions from the boilers.

Table 3.2 Emissions Units and Emissions Control Devices

Emissions Units	Emissions Control Device
Four, natural gas-fired boilers	None

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Table 3.3 contains a summary of the requirements that apply to the boilers. Specific permit requirements are listed below Table 3.3.

Table 3.3 Natural Gas-Fired Boilers Applicable Requirements Summary

Boiler	Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Operating, Monitoring & Recordkeeping Requirements
Boiler 1	3.2	PM	0.015 gr/dscf at 3% oxygen	PTC No. 011-00020	3.3, 3.8
	3.1	PM ₁₀	0.29 lb/hr, 1.29 T/yr		
		SO ₂	0.02 lb/hr, 0.09 T/yr		
		NO _x	3.87 lb/hr, 16.95 T/yr		
		CO	3.25 lb/hr, 14.24 T/yr		
		VOC	0.21 lb/hr, 0.92 T/yr		
Boiler 3	3.2	PM	0.015 gr/dscf at 3% oxygen	PTC No. 011-00020	3.3, 3.8
	3.1	PM ₁₀	0.22 lb/hr, 0.96 T/yr		
		SO ₂	0.02 lb/hr, 0.09 T/yr		
		NO _x	2.83 lb/hr, 12.4 T/yr		
		CO	2.38 lb/hr, 10.42 T/yr		
		VOC	0.16 lb/hr, 0.7 T/yr		
Boiler 4	3.2	PM	0.015 gr/dscf at 3% oxygen	PTC No. 011-00020	3.3, 3.8
	3.1	PM ₁₀	0.55 lb/hr, 2.40 T/yr		
		SO ₂	0.13 lb/hr, 0.74 T/yr		
		NO _x	10.2 lb/hr, 44.4 T/yr		
		CO	11.3 lb/hr, 49.2 T/yr		
		VOC	1.28 lb/hr, 5.60 T/yr		
Boiler 5	3.2	PM	0.015 gr/dscf at 3% oxygen	IDAPA 58.01.01.676	3.3, 3.8
Boilers 1, 3, 4, 5	3.3	Visible emissions	20% opacity for no more than three minutes in any 60-minute period.	IDAPA 58.01.01.625	3.6, 3.8

Permit Limits

3.1 Boilers 1, 3, and 4 shall not exceed any of the following emission rate limits:

Table 3.4 Boilers 1, 3, and 4 Allowable Emissions

Boiler Number	SO ₂		NO _x		CO		PM ₁₀		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
1	0.02	0.09	3.87	16.95	3.25	14.24	0.29	1.29	0.21	0.92
3	0.02	0.09	2.83	12.40	2.38	10.42	0.22	0.96	0.16	0.7
4	0.17	0.74	10.1	44.4	11.2	49.2	0.55	2.4	1.28	5.6

[PTC No. 011-00020, 9/10/01]

3.2 The PM emissions from boilers 1, 3, 4, and 5 shall not exceed 0.015 gr/dscf corrected to 3% oxygen. Compliance with this provision shall be demonstrated by annual tuning of the boilers by trained personnel.

[PTC No. 011-00020, 9/10/01; IDAPA 58.01.01.676, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 3.3 Visible emissions from each boiler stack shall not exceed 20% for a period or periods aggregating more than three minutes in any 60-minute period as required in IDAPA 58.01.01.625. Opacity shall be determined in accordance with the procedures contained in IDAPA 58.01.01.625.04.a, and IDAPA 58.01.01.625.04.b.
[IDAPA 58.01.01.625, 4/5/00]

Operating Requirements

- 3.4 The permittee shall combust natural gas exclusively in Boilers 1, 3, 4, and 5.
[PTC No. 011-00020, 9/10/01; IDAPA 58.01.01.322.01, 3/19/99]

Monitoring / Recordkeeping Requirements

- 3.5 When Boiler 4 is operating, the permittee shall monitor and record the amount of natural gas combusted once daily. Records of the amount of natural gas combusted in Boiler 4 shall be retained for the most recent five-year period, and shall be retained onsite for the most recent two-year period. These records shall be made available to Department representatives upon request.
[PTC No. 0140-0020, 3/20/90]
- 3.6 The permittee shall conduct a visible emissions observation on each boiler stack, once per calendar quarter, during daylight hours, when each boiler is in operation under normal operating conditions. Each observation shall be conducted in accordance with IDAPA 58.01.01.625. During this observation, a minimum of thirty 15-second observations shall be recorded while the process is in operation. The length of each observation shall be no less than 10 minutes. If opacity is greater than 20%, as determined in accordance with IDAPA 58.01.01.625, the permittee shall take all necessary corrective action and report excess emissions in accordance with Permit Condition 2.9. The permittee shall record the results of each visible emissions observation and corrective action taken, if any, and maintain the records in accordance with Permit Condition 2.11.
[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

Reporting

- 3.7 The permittee shall submit the following information for Boiler 4 to the Department in an annual report:
- The daily natural gas consumption during the year.
[PTC No. 0140-0020, 3/20/90]
- 3.8 All monitoring and recordkeeping required by this Tier I operating permit shall comply with Permit Condition 2.10. All reporting required by this Tier I operating permit shall comply with Permit Condition 2.11 and General Provision 24.
[IDAPA 58.01.01.322.06, 07, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020**Permittee:** Basic American Foods**Date Issued:** December 11, 2002**Location:** Shelley, Idaho**Date Expires:** December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

4. PROCESS A**Summary Description**

The following is a narrative description of the Process A of potato processing regulated in this Tier I operating permit. This description is for informational purposes only.

Process A produces dehydrated potato products. The raw materials input to the process are cooked potatoes and food additives, including sulfites. Drying heat is provided by natural gas combustion. Process A was installed in 1960.

All emissions associated with this process are potential sources of particulate matter. The dryers that combust natural gas are potential sources of NO_x, CO and volatile organic chemicals. The drying units can potentially emit SO₂ from the decomposition of sulfites. Minimal amounts of hazardous air pollutants and lead associated with natural gas combustion are emitted from this process.

Table 4.1 describes the control devices used in controlling emissions from the sources regulated in this permit.

Table 4.1 Emissions Units and Emissions Control Devices

Processes	Emissions Control Device	Emission Point
Process A	None	P1-1, P2-1, P3-1, P4-1

Table 4.2 contains only a summary of the requirements that apply to the potato products P1-P4. Specific permit requirements are listed below Table 4.2.

Table 4.2 Applicable Requirements Summary

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Operating, Monitoring & Recordkeeping Requirements
4.1	PM	Process weight	IDAPA 58.01.01.702	4.3, 4.5
4.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period.	IDAPA 58.01.01.625	4.4, 4.5

Permit Limits

4.1 Process A is subject to process weight limitations required by IDAPA 58.01.01.702, which states: "No person shall emit into the atmosphere from any process or process equipment operating prior to October 1, 1979, particulate matter in excess of the amount shown by the following equations, where *E* is the allowable emission from the entire source in pounds per hour, and *PW* is the process weight in pounds of raw product feed per hour associated with each process".

a. If *PW* is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If *PW* is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- 4.2 Visible emissions from each process stack shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required in IDAPA 58.01.01.625. Opacity shall be determined in accordance with the methods and procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

Monitoring / Recordkeeping Requirements

- 4.3 The process weight PM limitation applies to each emissions unit/process identified in Table 4.1. Demonstrating compliance with the visible emissions requirements contained in Permit Conditions 4.2 demonstrate compliance with the hourly process weight rate emissions limitations.

[IDAPA 58.01.01.322.01, 3/19/99]

Emissions estimates show that these units will not exceed process weight rate limits at the maximum process input rate. Therefore, no throughput monitoring or recordkeeping is required to demonstrate compliance.

- 4.4 To demonstrate compliance with Permit Condition 4.1, 4.2, and 4.3, the permittee shall conduct a monthly one-minute observation of each affected emissions point, or source, using EPA Method 22 (in 40 CFR 60, Appendix A). If visible emissions in excess of 10% opacity are observed from any emissions point, or source, a 6-minute observation, using EPA Method 9, shall be conducted. The visible emissions evaluations shall be performed during daylight hours under normal operating conditions. The results of each evaluation shall be recorded and shall be maintained in accordance with Permit Condition 2.11.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

Reporting

- 4.5 All monitoring and recordkeeping required by this Tier I operating permit shall comply with Permit Condition 2.11. All reporting required by this Tier I operating permit shall comply with Permit Condition 2.10 and General Provision 24.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

5. DRIED POTATO PRODUCTS (B)**Summary Description**

The following is a narrative description of Process B of the potato product process regulated in this Tier I operating permit. This description is for informational purposes only.

Process B produces dehydrated potato products. The raw materials input to the process are cooked potatoes, wet potato pieces and food additives, including sulfites. Drying heat is provided by indirect contact with steam and by natural gas combustion. This process was installed in 1986. All emissions associated with this process are potential sources of PM. The dryers that combust natural gas are potential sources of NO_x, CO and volatile organic chemicals. The drying units can potentially emit SO₂ from the decomposition of sulfites. Minimal amounts of hazardous air pollutants and lead associated with natural gas combustion are emitted from this process.

Table 5.1 below describes the control devices used in controlling emissions from the sources regulated in this permit.

Table 5.1 Emissions Units and Emissions Control Devices

Process	Emissions Control Device	Emission Point
Dried potato products (B)	None	P6-1, P8-1N, P8-1S, P8-2N, P8-2S P9-1, P10-1, P11-1

Table 5.2 contains only a summary of the requirements that apply to the potato dehydrators in process B. Specific permit requirements are listed below Table 5.2.

Table 5.2 Applicable Requirements Summary

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Operating, Monitoring & Recordkeeping Requirements
5.1	PM	Process weight	IDAPA 58.01.01.701	5.5, 5.8
5.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period.	IDAPA 58.01.01.625	5.5, 5.8
5.4	PM	4.95 lb/hr and 21.68 T/yr	PTC No. 011-00020	5.6, 5.8
5.3	Grain loading	0.2 gr/dscf (state-only)	PTC No. 011-00020	5.5, 5.8

Permit Limits / Standard Summary

5.1 Process B is subject to process weight limitations as required by IDAPA 58.01.01.701, which state: "No person shall emit into the atmosphere from any process equipment commencing operation on or after October 1, 1979, particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds of raw product feed per hour associated with each process."

- a. If PW is less than 9,250 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- b. If PW is equal to or greater than 9,250 lb/hr,

$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.701, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

5.2 Visible emissions from each process stack shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required in IDAPA 58.01.01.625. Opacity shall be determined in accordance with the methods and procedures contained in IDAPA 58.01.01.625.
[IDAPA 58.01.01.625, 4/5/00]

5.3 Emissions of PM₁₀ emanating from each stack of Process B shall not exceed 0.2 gr/dscf in the stack gas in accordance with IDAPA 58.01.01.710.08(b).
[PTC No. 011-00020, 9/10/01]

5.4 Process B shall not exceed any limits listed below in Table 5.3.

Table 5.3 Emission Limits

Source Description	PM ₁₀ ^a	
	lb/hr	T/yr
Process B	4.95	21.68

[PTC No. 011-00020, 9/10/01]

Operating Requirements

5.5 The maximum combined raw potato in-feed to the dryers associated with stacks P9-1, P10-1, and P11-1 shall not exceed 19.9 T/hr, based on a daily average.
[PTC No. 011-00020, 9/10/01]

Monitoring / Recordkeeping Requirements

5.6 To demonstrate compliance with Permit Condition 5.1, 5.2, and 5.3, the permittee shall conduct a monthly one-minute observation of each affected emissions point, or source, using EPA Method 22 (in 40 CFR 60, Appendix A). If visible emissions in excess of 10% opacity are observed from any emissions point, or source, a 6-minute observation, using EPA Method 9, shall be conducted. The visible emissions evaluations shall be performed during daylight hours under normal operating conditions. The results of each evaluation shall be recorded and shall be maintained in accordance with Permit Condition 2.11.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

5.7 The average hourly raw potato infeed rate for Process B shall not exceed 19.9 T/hr. The average hourly raw potato infeed rate shall be calculated by multiplying the daily average finished dry production rate (pounds/hour) by the raw-to-dry factor of 6.02, then divide by 2,000 lbs per ton, to convert to tons per hour.
[PTC No. 011-00020, 9/10/01]

Reporting

5.8 All monitoring and recordkeeping required by this Tier I operating permit shall comply with Permit Condition 2.11. All reporting required by this Tier I operating permit shall comply with Permit Condition 2.10 and General Provision 24.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

6. COMPLIANCE SCHEDULE

The BAF Shelley facility is not in compliance at the time of issuance of the Tier I operating permit with the applicable PTC requirements for sources listed in Permit Condition 6.1. To bring the facility into compliance with the applicable requirements in the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.01, et seq., the permittee shall obtain a combined facility-wide Tier II operating permit and PTC (hereafter referred to as the facility-wide permit) and a modified Tier I operating permit. The specific elements of the compliance schedule are summarized in Table 6.1 and specified in Permit Conditions 6.2 through 6.9.

Table 6.1 Compliance Schedule

Permit Conditions	Milestone	Deadline	Documentation / Reporting
6.2	Permittee shall submit complete facility-wide permit application to comply with IDAPA 58.01.01.400 through 410	Within 6 months after issuance of Tier I operating permit	Issuance of completeness letter from the Department to permittee
6.3	Concurrently submit complete application information to address the applicable PTC requirements in IDAPA 58.01.01.200 through 223 for those sources for which the permittee is now required to obtain a PTC	Within 6 months after issuance of Tier I operating permit	Issuance of completeness letter from the Department to permittee
6.4	Submit supplemental application information to address the applicable PTC requirements for any additional sources identified	Within 30 days of a request in writing by the Department during processing of the facility-wide permit.	Issuance of completeness letter from the Department to permittee
6.7	Submit a request to modify the Tier I operating Permit	30 days after the facility-wide permit application is found complete	Issuance of completeness letter from the Department to permittee
6.8	Submit quarterly progress reports	January 1, April 1, July 1, and October 1 of each year	

- 6.1 The Department and BAF have identified that Process A (including, but not limited to, process dryers) are not in compliance because permits to construct were not obtained prior to construction or modification.

The permittee has the continuing responsibility to submit any supplementary information needed, including information for any other sources, in accordance with IDAPA 58.01.01.315.

- 6.2 The BAF Shelley facility shall submit a complete permit application and all additional information requested by the Department for issuance of a facility-wide permit within 180 days of issuance of this Tier I operating permit. The application shall address the requirements for Tier II operating permits in accordance with IDAPA 58.01.01.400 through 410.

[IDAPA 58.01.01.322.10, 4/5/00]

- 6.3 In addition to the requirements for Tier II operating permits, the facility-wide permit application shall include all of the applicable information and address the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through IDAPA 58.01.01.223 for the construction and/or modification of sources for

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

which the permittee was required to, but did not obtain, a PTC. The Department has identified the sources listed in Permit Condition 10.1 as sources that failed to obtain a permit prior to construction or modification.

[IDAPA 58.01.01.322.10, 4/5/00]

- 6.4 If through the development of the facility-wide permit, it is determined that the facility should have obtained a PTC or a PTC modification for any other sources or sources at the facility, the permittee shall submit a supplemental application that addresses the applicable requirements for PTCs within 30 days of receiving written notification from the Department.

[IDAPA 58.01.01.322.10, 4/5/00]

- 6.5 The application submittal deadlines set forth in the compliance schedule may be extended if the permittee clearly demonstrates that additional time is needed to collect new data for submittal of a complete application. Extension requests, with complete information to justify the request, must be submitted in writing to the Department no later than the midpoint of the milestone timeline. The deadlines may be extended for up to one year through written authorization from the Department

[IDAPA 58.01.01.322.10, 4/5/00]

- 6.6 The Department will draft a single proposed facility-wide permit for the facility upon receipt of a complete application. The permit will contain all of the terms and conditions necessary to comply with the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through 223 and the requirements for Tier II operating permits in accordance with IDAPA 58.01.01.400 through 410. The permit will clearly identify the origin and basis for each term and condition. The procedures for issuing a PTC under IDAPA 58.01.01.209 shall be followed concurrently with the procedures for issuing a Tier II operating permit under IDAPA 58.01.01.404.

[IDAPA 58.01.01.322.10, 4/5/00]

- 6.7 The BAF Shelley facility shall request a modification to their Tier I operating permit within 30 days after the combined facility-wide operating permit and PTC application is determined complete by the Department. Their Tier I operating permit shall be modified to incorporate all applicable requirements of the facility-wide permit and shall be issued concurrently with the facility-wide permit in accordance with the procedures for issuing a Tier I permit in IDAPA 58.01.01.360 through 369.

[IDAPA 58.01.01.322.10, 4/5/00]

- 6.8 Until such time that a modified Tier I operating permit is issued pursuant to Permit Condition 10.7 Basic American Foods Shelley facility shall submit a progress report each calendar quarter to the Department stating when each of the milestones and compliance with each condition in the compliance schedule were or will be achieved, and an explanation of why any dates were not or will not be met and a detailed description of any preventative or corrective measures undertaken by the permittee.

[IDAPA 58.01.01.322.10, 4/5/00]

- 6.9 This schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based.

[IDAPA 58.01.01.322.10, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

7. INSIGNIFICANT ACTIVITIES

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b)(i) are listed in the Tier I operating permit to qualify for a permit shield.

Table 7.1 Insignificant Activities

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(i) Citation
Operation, loading, and unloading of storage tanks and storage vessels, with lids or other appropriate closures and less than 260-gallon capacity, heated only to the minimum extent necessary to avoid solidification.	1
Operation, loading, and unloading of storage tanks not greater than 1,100 gallon capacity with lids, not containing hazardous air pollutants, and with maximum vapor pressure of 550 mm Hg.	2
Operation, loading, and unloading of volatile organic compound storage tanks, 10,000 gallon capacity or less, with lids or other appropriate closure and vapor pressure not greater than 80 mm Hg at 21°C.	3
Operation, loading, unloading, and storage of butane, propane, or liquefied petroleum gas in storage tanks or vessels with less than 40,000 gallon capacity.	4
Operation, loading, and unloading of gasoline storage tanks, 10,000 gallon capacity or less, with lids or other appropriate closure.	3
Combustion sources, less than 5 MMBTU/hr, exclusively using natural gas, butane, propane, and/or liquefied petroleum gas.	5
Combustion source, not greater than 500,000 BTU/hr, if burning waste wood, wood waste, or waste paper.	8
Welding using not more than one ton of rod per day.	9
"Parylene" coaters using less than 500 gallons of coating per year.	11
Printing and silk-screening, using less than 2 gallons per day of a combination of inks, coatings, adhesives, fountain solutions, thinners, retarders, or nonaqueous cleaning solutions.	12
Water cooling towers, not using chromium-based corrosion inhibitors, not using barometric jets or condensers, not greater than 10,000 gallons per minute, and not in direct contact with gaseous or liquid process streams containing regulated air pollutants.	13
Industrial water chlorination, less than 20 Million Gallons per day capacity.	16
Surface coating, using less than 2 gallons per day.	17
Space heaters and hot water heaters using natural gas, propane or kerosene, and generating less than 5 MMBTU/hr.	5
Tanks, vessels and pumping equipment, with lids or other appropriate closure, for storage or dispensing of aqueous solutions of inorganic salts, bases and acids. Excluding solutions with 99% or greater sulfuric or phosphoric acid; 77% or greater nitric acid; 30% or greater hydrochloric acid; or more than one liquid phase where the top phase is more than 1% VOC.	19
Equipment, with lids or other appropriate closure, used exclusively to pump, load, unload, or store high-boiling-point organic material, with an initial boiling point not less than 150°C or vapor pressure not more than 5 mm Hg at 21°C.	20
Milling and grinding activities (paste forms, if used, are less than 1% VOC).	22
Rolling, forging, drawing, stamping, shearing, and spinning metals.	23
Dip-coating operations using materials with less than 1% VOC.	24
Surface coating, aqueous solution, or suspension containing less than 1% VOC.	25
Cleaning and stripping activities and equipment, using solutions having less than 1% volatile organic compounds by weight (no acid cleaning or stripping on metal substrates).	26

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Storage and handling of water based lubricants for metal working with organic content less than 10%.	27
Process Stack P1-2	30
Process Stack P1-3	30
Process Stack P1-2	30
Process Stack P2-2	30
Process Stack P2-3	30
Process Stack P3-2	30
Process Stack P3-3	30
Process Stack P4-2	30
Process Stack P4-3	30
Process Stack P5-1	30
Process Stack P5-2	30
Pkg-1	30
MT-1	30
MT-2	30

- 7.1 There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the Facility-wide Permit Conditions.

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020**Permittee:** Basic American Foods**Date Issued:** December 11, 2002**Location:** Shelley, Idaho**Date Expires:** December 11, 2007*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.***8. NONAPPLICABLE REQUIREMENTS**

State and federal air quality requirements (e.g., rules and regulations) currently determined not applicable to the permittee are listed below along with the reason for the non-applicability.

[IDAPA 58.01.01.325.01(b)]

<u>Requirement</u>	<u>Reason Code</u>
IDAPA Chapter 58.01.01:	
Section 000-002 Legal Authority, Title and Scope, Written Interpretations	i
Section 214 Preconstruction Requirements for Major HAP Sources	b
Section 336 Tier I Permits for Portable Sources	b
Section 500 Registration for Portable Equipment	b
Section 563-574 Transportation Conformity	b
Section 580 Classification of PSD Areas	i
Section 582 Conformity for Northern Ada County PM-10 Maintenance Area	d
Section 610-613 Industrial Flares, Residential Waste Fires, Landfill Site Fires, Orchard Fires	b
Section 626 Visible Emissions from Wigwam Burners	b
Section 776.02 Odors from Rendering Plants	b
Section 750-751 Control of Fluoride Emissions	a
Section 790-999 Rules for Specific Source Categories	b
40 CFR	
Part 49 Tribal Clean Air Authority	c
Part 51 Sections 51.1-51.45	i
Part 55 OCS Air Regulations	b
Part 56 Regional Consistency	i
Part 57 Nonferrous Smelter Rules	b
Part 59 VOC Standards for Consumer and Commercial Products	b
Part 60, except subparts A, Dc, and appendixes	b
Part 61, except subpart A, M, and appendixes	b
Part 62 Approval and Promulgation of State Plans for Designated Facilities and Pollutants	b
Part 63 National Emission Standards for Hazardous Air Pollutants	b
Part 64 Compliance Assurance Monitoring	g
Part 71 through 80	b
Part 82, except subpart F	b
Part 85 through 94	b

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Reason code definitions:

- a this pollutant is not emitted by the facility
- b the facility is not in this source category
- c the facility is not in a special control/nonattainment area
- d the facility is not in this county
- e the facility does not have this emissions unit
- f the facility does not use this fuel type
- g there are no emissions units with add-on control devices or the pre-controlled potential emissions are less than 100 T/yr or the emissions units with add-on control devices and pre-controlled emissions greater than 100 T/yr are subject to emissions standards promulgated after November of 1990
- h this method/procedure is not used by the facility
- i this rule applies only to the Department and regional authorities

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

TIER I OPERATING PERMIT GENERAL PROVISIONS

General Compliance

1. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.
[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]
2. It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.
IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]
3. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.
[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening

4. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.
[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99;
40 CFR 70.7(f)(1) and (2); 40 CFR 70.6(a)(6)(iii)]
5. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any Permit Condition.
[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

6. This permit does not convey any property rights of any sort, or any exclusive privilege.
[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

7. The permittee shall furnish all information requested by the Department, within a reasonable time, that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
[Idaho Code §39-108; IDAPA 58.01.01.122 (5/1/94) and 322.15.f (4/5/00);
40 CFR 70.6(a)(6)(v)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

8. Upon request, the permittee shall furnish to the Department copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00;
40 CFR 70.6(a)(6)(v)]

Severability

9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

10. The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/5/00; IDAPA 58.01.01.322.15.i, 380- 386, 3/19/99;
40 CFR 70.4(b)(12), (14) and (15), and 70.7(d) and (e)]

11. Changes that are not addressed or prohibited by the operating permit require a operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01. 383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 3/19/99; IDAPA 58.01.01.209.05, 5/1/94;
40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

12. Unless specifically identified as a "state-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by the Department in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1) and (2)]

13. Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

Inspection and Entry

14. Upon presentation of credentials, the permittee shall allow the Department or an authorized representative of the Department to do the following:

- Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit.

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit.
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.i, 3/19/99; 40 CFR 70.6(c)(2)]

New Requirements During Permit Term

15. The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94;
40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

16. The owner or operator of a Tier I source shall pay annual registration fees to the Department in accordance with IDAPA 58.01.01.525 through IDAPA 58.01.01.538.

[IDAPA 58.01.01.322.15.n, 5/1/94; 40 CFR 70.6(a)(7)]

Certification

17. All documents submitted to the Department shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

- 18.1 The owner or operator of a Tier I source shall submit an application to the Department for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

- 18.2 If a timely and complete application for a operating permit renewal is submitted, but the Department fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

19. Compliance with the terms and conditions of the operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- a. Such applicable requirements are included and are specifically identified in the operating permit; or

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- i. The Department has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- c. Nothing in this permit shall alter or affect the following:
 - i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
 - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
 - iv. The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of the Department to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 322.15.m, 325, 5/1/94; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

20.
 - a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
 - b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
 - c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
 - d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.
[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 10, 5/1/94; 40 CFR 70.6(c)(3) and (4)]

Periodic Compliance Certification

21.
 - a. The permittee shall submit compliance certifications during the term of the permit for each emissions unit to the Department and the EPA as follows:
 - b. Compliance certifications for all emissions units shall be submitted annually beginning 12 months from the permit issuance date, or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by the Department;
 - c. The compliance certification for each emissions unit shall address all of the terms and conditions contained in the operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

- d. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
- i. The identification of each term or condition of the operating permit that is the basis of the certification;
 - ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA which prohibits knowingly making a false certification or omitting material information;
 - iii. The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Paragraph 21.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;
 - iv. Such other facts as the Department may require to determine the compliance status of the source.
- e. All original compliance certifications shall be submitted to the Department and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 70.6(c)(5)(iii); 40 CFR 70.6(c)(5)(iv)]

False Statements

22. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

No Tampering

23. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports

24. In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months starting six months from the date of permit issuance. All instances of deviations from this operating permit's requirements must be clearly identified in the report. All required reports must be certified in accordance with IDAPA 58.01.01.123.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00;
40 CFR 70.6(a)(3)(iii)]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 011-00020

Permittee: Basic American Foods
Location: Shelley, Idaho

Date Issued: December 11, 2002
Date Expires: December 11, 2007

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Reporting Deviations and Excess Emissions

25. The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00;
40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required

26. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

27. In accordance with IDAPA 58.01.01.332, an "emergency" as defined in IDAPA 58.01.01.008., constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 3/19/99; 40 CFR 70.6(g)]